

EXHIBIT G

Felecia Wilcox Affidavit

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION**

VERNEISA JACKSON

Plaintiffs,

v.

**CORRECTIONS CORPORATION OF
AMERICA,**

Defendant.

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* **CIVIL ACTION NO:**
* **3:11-cv-111-DHB-WLB**
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AFFIDAVIT OF FELECIA WILCOX

I, Felecia Wilcox, swear and affirm under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, belief, and contain only facts and present all of the information that I believe to be important:

1. I have personal knowledge of the facts set forth herein and can provide competent testimony regarding these matters.
2. I am over 18 years of age and reside in Lumber City, Georgia.
3. I was previously employed as a Correctional Officer for the Defendant in this case, Corrections Corporation of America (Hereafter referred to as "CCA"), which is located in McRae, Georgia. CCA is a minimum security federal detention facility, which operates as a contractor for the U.S. Bureau of Prisons.
4. I worked for CCA from April 5, 2004 until July 28, 2010.
5. During my employment at CCA, I was sexually harassed by my supervisor, L. Jackson, discriminated against, and subjected to a hostile working environment by other male staff and management under the direction of Warden Wells.

6. These incidents were reported to Warden Wells through verbal complaints, written complaints, the Employee Grievance Procedure, and the Equal Employment Opportunity Commission (EEOC).

7. In July 2009, I also complained to Shannon Pooler, Human Resource Manager, about the hostile work environment, sexual harassment and racial discrimination at the facility and she recommended that I file a hostile work environment complaint. I filed the complaint.

8. After my sexual harassment complaint, it was months before I was separated from L. Jackson unlike white female employees (L. Goldman-Knowles separated from G. Wilcox, K. Spires separated from B. Cooper) who were immediately separated from their harassers after they complained.

9. Black female Correctional Officers Byron, Farrow, Scott, and Harvey informed me that they all reported sexual comments made to them by a black male supervisor, Captain Bobby Cooper to management. I was told by Mr. Cooper that when these black females complained, he was informed by management that the complaints had been made but nothing was done; however, when the white female, K. Spires complained, Cooper was walked out of the facility on that same day that and later terminated.

10. After my complaints and throughout 2010, due to my legitimate good-faith complaints, I was further harassed, and retaliated against which subjected me to a stressful and hostile work environment.

11. I know that I was terminated in retaliation for making legitimate complaints against my harassers and for filing an EEOC charge of race discrimination, sex discrimination, and ongoing retaliation against CCA in December 2009.

12. Because the harassment continued, I continued to complain and eventually I was terminated on July 28, 2010, for allegedly making false complaints.

13. I never made any false complaints; I simply complained in good-faith about the harassment that I was enduring.

14. It is my belief that Warden Wells' and CCA managements' treatment of

Verneisa Jackson in regards to them answering her grievances in a timely manner, not separating her from her harasser, disciplining her, and not promoting her was a part of the willful pattern and practice of race discrimination, and hostile work environment that was routinely displayed toward minorities at CCA.

FURTHER AFFIANT SAYETH NOT.

12-12-13
Dated

Felecia Wilcox
Felecia Wilcox

**STATE OF GEORGIA
COUNTY OF TELFAIR**

Sworn and subscribed to before me this 12 day of December, 2013. Such person did take an oath and produced satisfactory identification.

Amey Joseph
Notary Public [SEAL]

My Commission Expires:
Notary Public, Telfair Co., GA.
My Commission Expires Feb. 11, 2014